

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

<div>In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  as representative of  THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>  Debtors.<sup>1</sup></div>	<div>PROMESA Title III  Case No. 17 BK 3283-LTS (Jointly Administered)</div>
<div>In re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO  as representative of  PUERTO RICO ELECTRIC POWER AUTHORITY,  Debtor.</div>	<div>PROMESA Title III  Case No. 17 BK 4780-LTS</div>

**JOINT INFORMATIVE MOTION AND NOTICE OF REQUEST TO BE HEARD  
AT THE SEPTEMBER 21-22, 2022 OMNIBUS HEARING**

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

**TO THE HONORABLE DISTRICT COURT:**

**COME NOW** Unión de Trabajadores de la Industria Eléctrica y Riego, Inc. (“UTIER”) and Sistema de Retiro de Empleados de la Autoridad de Energía Eléctrica (“SREAEE”) duly represented by the undersigned counsel and respectfully submit this informative motion in response to the Court’s *Order Regarding Procedures for September 21-22, 2022, Omnibus Hearing* (“Order”) setting forth the guidelines for parties wishing to be heard at the September 21-22, 2022, omnibus hearing (“Hearing”).

1. Pursuant to the Order, without waiving any of its previous arguments regarding the severe nature of this briefing schedule, UTIER informs that attorneys Jessica Méndez Colberg, Rolando Emmanuelli Jiménez and Zoé Negrón Comas will appear on its behalf at the Hearing, to the extent that the national emergency, weather conditions, power outages and other such technical difficulties allow it.
2. For its part, without waiving any of its previous arguments regarding the harsh nature of this briefing schedule, SREAEE informs that attorneys Rafael Ortiz Mendoza, Jessica Méndez Colberg, Rolando Emmanuelli Jiménez and Zoé Negrón Comas will appear on its behalf at the Hearing, to the extent that the national emergency, weather conditions, power outages and other such technical difficulties allow it.
3. The email addresses of the respective counsel are as follows: Rolando Emmanuelli-Jiménez, [rolando@emmanuelli.law](mailto:rolando@emmanuelli.law); Jessica Méndez-Colberg, [jessica@emmanuelli.law](mailto:jessica@emmanuelli.law); Zoé Negrón-Comas, [zoe@emmanuelli.law](mailto:zoe@emmanuelli.law), Rafael Ortiz-Mendoza, [rafael.ortiz.mendoza@gmail.com](mailto:rafael.ortiz.mendoza@gmail.com).
4. UTIER and SREAEE’s legal representatives reserve the right to be heard on any matter concerning the *Urgent Motion of Financial Oversight and Management Board for Order (I) Establishing Schedule to Continue Negotiations During Litigation of Gating Issues Pursuant*

*to Litigation Schedule and (II) Granting Related Relief* (“Urgent Motion”) [Docket No. 2956 in Case No. 17-4780)] and the subsequent related filings, as well as any matter scheduled for the Hearing or raised by any party at the Hearing related to the Title III case, or any adversary proceeding pending in the Title III cases, or the interests of UTIER and SREAEE.

**WE HEREBY CERTIFY** that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. A courtesy copy of this Motion will be delivered to the Court by email to [SwainDPRCorresp@nysd.uscourts.gov](mailto:SwainDPRCorresp@nysd.uscourts.gov) as provided in *First Amended Standing Order*.

**In Ponce, Puerto Rico, this 19<sup>th</sup> day of September 2022.**



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